

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY)

15 Mountain View Road)

Warren, NJ 07061-1615)

Plaintiff,)

v.)

ALFRED KEMP, Individually and d/b/a)

KEMP PLUMBING)

P.O. Box 1322)

Pembroke, MA 02359)

and)

MARTIN SANDBORG, Individually and d/b/a)

SANDBORG PLUMBING AND HEATING)

13 Liberty Street)

Sandwich, MA 02563,)

Defendants.)

C.A. No.: 04-11975-RWZ

BBO# 552588

**DEFENDANT, ALFRED KEMP, Individually and d/b/a KEMP PLUMBING's
REQUESTED JURY VOIR DIRE**

Now comes the Defendant, Alfred Kemp, Individually and d/b/a Kemp Plumbing, and hereby requests the Court to submit the following questions to the jury pool during voir dire in addition to the general voir dire questions posed by the court to the jury pool:

1. Have you, any family member, relative, or close friend ever been involved in or a victim of any loss arising from or associated with a fire?
2. Have you, any family member, relative, or close friend ever been involved in or a victim of any loss arising from or associated with work performed by a plumber?
3. Have you, any family member, relative, or close friend ever been a plaintiff in a civil lawsuit?

4. Have you, any family member, relative, or close friend ever sustained property damage to your business or residence?
5. Are you, or is any family member, relative or close friend a shareholder or employee of Chubb Insurance and/or Pacific Indemnity Company.
6. Are you, or is any family member, relative or close friend a shareholder or employee of an insurance company.

Defendant, Al Kemp, Individually and d/b/a
Kemp Plumbing,
By his attorneys,

/s/ Christopher G. Betke
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